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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON SEATTLE

RAJU A.T. DAHLSTROM,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Case No. 2:16-cv-01874

STIPULATED MOTION FOR EXTENSION OF TIME AND PROPOSED ORDER

Noted on Motion Calendar: April 18, 2017

JOINT STIPULATION

COMES NOW plaintiff, Raju Dahlstrom, by and through his attorney, Richard L. Pope, and defendant, United States of America, stipulate and agree to a 60-day extension of time for the United States of America to file responsive pleadings to Plaintiff's complaint. Plaintiff has asserted claims against the United States and fifteen alleged employees of the Sauk-Saittle Indian Tribe of Washington pursuant to, among other things, the Federal Tort Claims Act, 28 U.S.C. § 1346 et seq. and Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971). This extension is necessary to allow the United States to adequately review the common law tort claims and respond to Plaintiff's assertions that the fifteen individual

| 1 | defendants were employees acting within the scope of employment on behalf of the United |
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| 2 | States. |
| 3 | WHEREFORE, the parties agree that the new deadline for the United States to file its |
| 4 | responsive pleading shall be July 17, 2017. |
| 5 | SO STIPULATED. |
| 6 | Dated this day of April, 2017. |
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| 8 | //n:1 17 n |
| 9 | /s/ Richard L. Pope RICHARD L. POPE, WSBA No. 21118 |
| 10 | Lake Hills Legal Services, P.C. 15600 N.E. 8 th Street, Suite B1-358 |
| 11 | Bellevue, Washington 98008 Phone: 425-829-5305 |
| 12 | Email: rp98007@gmail.com |
| 13 | Attorney for Plaintiff |
| 14 | SO STIPULATED. |
| 15 | Dated this 18 th day of April, 2017. |
| 16 | |
| 17 | ANNETTE L. HAYES United States Attorney |
| 18 | |
| 19 | /s/ Tricia Boerger |
| 20 | TRICIA BOERGER, WSBA No. 38581 Assistant United States Attorney |
| 21 | United States Attorney's Office 700 Stewart Street, Suite 5220 |
| 22 | Seattle, Washington 98101-1271 Phone: 206-553-7970 |
| 23 | Email: tricia.boerger@usdoj.gov |
| 24 | Attorneys for Defendant United States of America |
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STIPULATED MOTION FOR EXTENSION OF TIME AND [PROPOSED] ORDER [Case No. 2:16-cv-01874] - 2 UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970

ORDER

The Court, having reviewed the pleadings and record in this matter and the parties having stipulated and agreed, it is hereby **ORDERED** that the deadline for the United States of America to file responsive pleadings to Plaintiff's complaint is July 17, 2017.

Dated this 20 day of ______, 2017

Robert S. Lasnik United States District Court Judge

STIPULATED MOTION FOR EXTENSION OF TIME AND [PROPOSED] ORDER [Case No. 2:16-cv-01874] - 3